

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DALONTE WHITE,)	CASE NO. 1:17-cv-01165-PAB
)	
Plaintiff)	JUDGE PAMELA A. BARKER
)	
v.)	
)	
CITY OF CLEVELAND, et al.,)	DECLARATION OF
)	TIMOTHY J. PUIN
)	
Defendants)	

1. I am an adult who is competent to make this declaration pursuant to 28 U.S.C.A. § 1746 and I have first-hand knowledge of the facts set forth herein.

2. I am one of the attorneys for Defendant City of Cleveland in the captioned action.

3. In July or August of 2019, I had a telephone conference with Sandhya Gupta, former counsel for Plaintiff, in which I pointed out that Plaintiff sued David Santiago, Jr., in this action, not David Santiago. Attorney Gupta acknowledged my point but made no substantive comment.

4. In speaking with Attorney Gupta, I did not purport to represent either man; recommend any procedure for addressing the issue; or indicate that I had authority to permit any kind of substitution of parties outside the Rules of Civil Procedure.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 13, 2020.

/S/ Timothy J. Puin



Signed, TIMOTHY J. PUIN (#0065120)

EXHIBIT

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